de maximis, inc.

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June 6, 2006

Mr. Stephen Keyahes, Case Manager
New Jersey Department of Environmental Protection
401 East State Street, P.O. Box 028
Trenton, NJ 08625-0028

VIA Federal Express

RE: Bayonne Barrel & Drum Site
Preliminary Groundwater Modeling Report

Dear Mr. Keyahes:

This letter transmits the submittal of a Preliminary Groundwater Modeling Report prepared by Golder Associates, Inc. ("Golder") on behalf of the Bayonne Barrel & Drum Site PRP Group ("Group").

The Remedial Investigation Report (Quest) for the referenced site was submitted by the Group in January 2005 and comments from NJDEP were received in August 2005. NJDEP recognized in their comments the practical constraints associated with off-site monitoring wells. The NJDEP suggested the application of a model utilizing groundwater flow velocity and half-lives of the appropriate groundwater contaminants to support the proposal for natural attenuation at the site. As you are aware, we have been proceeding as suggested and have periodically notified you of our activities, first with the selection of Golder as our modeling contractor, and later with various notifications of field activities undertaken to support this effort.

As you are additionally aware, during the course of the field investigation an observation of free product was made at UST-1 which had not been earlier observed. Laboratory fingerprint analysis of the media has been provided under separate cover, and a remedial investigation work plan will soon be submitted for your review. We recognize that until the newly observed condition at UST-1 is investigated, it will not be possible at this time to finalize the groundwater model in support of a natural attenuation remedy for Site groundwater.

Notwithstanding the pending investigation, we are submitting for your review and comment the attached Preliminary Groundwater Modeling Report. Key findings from the study include:

- Groundwater flow directions have been delineated in a predominantly east-southeast direction, confirming findings presented in the RI Report.

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- Fate and transport modeling using site-specific data indicates that no Site contaminant of concern (COC) is expected to reach the nearby Passaic River at concentrations greater than GWQS, if at all.

We will provide information regarding the investigation of UST-1 as it becomes available. In the meantime, if you have any questions concerning the attached Preliminary Groundwater Model Report please do not hesitate to contact me.

Thank you for your attention in this matter.

Very truly yours,

de maximis, inc.

William J. Lee

Attachment

cc: ✓Joseph Cosentino, USEPA
Sarah Flanagan, USEPA
Alison Saling, K&LNG
William Hyatt, K&LNG (w/o att.)
Doug Reid-Green, BASF Corporation
John Vidumsky, DuPont Specialty Chemicals
Todd Rees, Golder Associates (w/o att.)

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Golder Associates

June 1, 2006

Our Ref.: 063-6907

de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Attention: William Lee

Dear Mr. Lee:

Attached is our Preliminary Groundwater Modeling Report for the Bayonne Barrel and Drum Site in Newark, New Jersey. If you should have any questions, please feel free to contact Todd Rees.

Sincerely,

GOLDER ASSOCIATES INC.

Ross W. Bennett
Staff Engineer

Todd R. Rees, PhD, P.E.
Senior Consultant and Principal

THR/cam